

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

IN RE: PREFERRED READY-MIX, LLC

NO. 21-33369

CHAPTER 11

Debtor(s).

**APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND
RETENTION OF JESSICA L. HOFF OF HOFF LAW OFFICES
AS COUNSEL FOR THE DEBTOR**

The Debtor in the above captioned Chapter 11 case (“Debtor”), hereby applies to the Court, pursuant to Fed.R.Bankr.P. 2014(a), 11 U.S.C. §§327 and 1107, for an order authorizing it to retain and employ Jessica L. Hoff of Hoff Law Offices, P.C. (“HL”), as its legal counsel in the above-captioned case and related proceedings. As grounds for this application, Debtor states the following:

1. Debtor seeks to employ Jessica L. Hoff, Esq. as chapter 11 general bankruptcy counsel pursuant to 11 U.S.C. § 327. The following information and documents are provided in support of this Motion. The Professional seeks compensation pursuant to: 11 U.S.C. § 328.
2. The Debtor selected this Professional because the Professional is well qualified to represent the Debtor in this proceeding.
3. Professional agrees to render legal services in connection with the Debtor’s chapter 11 case, including but not limited to the following services: (A) Advise the Debtor regarding matters of bankruptcy law and concerning the requirements of the Bankruptcy Code, and

Bankruptcy Rules relating to the administration of this case, and the operation of the Debtor's estate as a debtor in possession; (B) Represent the Debtor in proceedings and hearings in the court involving matters of bankruptcy law; (C) Assistance in compliance with the requirements of the Office of the United States trustee; (D) Provide the Debtor legal advice and assistance with respect to the Debtor's powers and duties in the continued operation of the Debtor's business and management of property of the estate; (E) Assist the Debtor in the administration of the estate's assets and liabilities; (F) Prepare necessary applications, answers, motions, orders, reports and/or other legal documents on behalf of the Debtor; (G) Assist in the collection of all accounts receivable and other claims that the Debtor may have and resolve claims against the Debtor's estate; (H) Provide advice, as counsel, concerning the claims of secured and unsecured creditors, prosecution and/or defense of all actions; (I) Prepare, negotiate, prosecute and attain confirmation of a plan of reorganization;

4. A declaration by the Professional provides information on the following: identification/qualifications; disinterestedness; compliance with FRBP 2014 and FRBP 5002; and compensation arrangements.

WHEREFORE, the Debtor requests the authority to employ the Professional to represent the Debtor in this case.

Dated 10/20/2021

By: s/ Jessica L. Hoff

Jessica L. Hoff, Counsel to Debtor

Dated 10/20/2021

By: s/ Lincoln M. Catchings, III

DECLARATION OF PROFESSIONAL

I, Jessica L. Hoff, Esq., am duly licensed to practice before this Court.

I, Jessica L. Hoff, Esq., was initially employed by the debtor and am familiar with the facts and legal issues involved in the case.

I, Jessica L. Hoff, Esq., do not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed.

I, Jessica L. Hoff, Esq. have no connections with the debtor, creditors, any parties in interest, the Bankruptcy Administrator, or the Trustee, other than with the representation of the debtor and upon granting of this application, the estate, in the representation of the estate in this action.

The debtor has signed a contract with Jessica L. Hoff for representation regarding the cause of action. The terms of the contract include attorney fees billable at a rate of \$400.00 hour, \$175.00 hour paralegal work, \$75.00 hour secretarial work, plus reimbursement of out-of-pocket expenses. I, Jessica L. Hoff understand that I cannot share any compensation with attorneys other than members of my firm unless said professionals are also approved by this Court. I, Jessica L. Hoff do not have any agreement to share compensation with other attorneys in this matter. I, Jessica L. Hoff understand that I must make an application to the Court for approval of his/her fees and expenses.

Dated October 21, 2021

/s/ Jessica L. Hoff

Jessica L. Hoff Counsel

to Debtor

Hoff Law Offices, P.C.

440 Louisiana St Suite 850

Houston, TX 77002

(303) 803-4438 Fax: (303) 648-4478

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the APPLICATION TO EMPLOY PROFESSIONAL PERSON and PROPOSED ORDER was served by placing the same in the United States Mail, first class postage pre-paid, October 21, 2021 to the following and those listed on the mailing matrix attached hereto:

s/Jessica L. Hoff, Esq.